NATALIE K. WIGHT, OSB # 035576

United States Attorney District of Oregon

SEAN E. MARTIN, OSB # 054338

Assistant United States Attorney 1000 S.W. Third Avenue, Suite 600 Portland, OR 97204-2902 sean.martin@usdoj.gov Telephone: (503) 727-1010

Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

CASCADIA WILDLANDS,

Case No. 6:22-cv-00767-AA

Plaintiff,

STIPULATED MOTION TO REVISE/EXTEND SUMMARY JUDGMENT BRIEFING

CHERYL ADCOCK; PAUL TIGAN; DEADLINES and U.S. BUREAU OF LAND MANAGEMENT,

Defendants,

and

v.

AMERICAN FOREST RESOURCE COUNCIL,

Defendant-Intervenor.

The parties make this stipulated motion to revise/extend the remaining summary judgment briefing deadlines in this action. See ECF 36 (current summary judgment briefing deadlines). Pursuant to LR 7-1, counsel for the parties conferred, and this is a stipulated and non-opposed motion.

The parties request the following revised/extended summary judgment briefing schedule:

- **April 26**: Deadline for Defendants to file a combined cross-motion for summary judgment and response to Plaintiff's motion for summary judgment (current deadline is April 12).
- May 3: Deadline for Defendant-Intervenor to file a combined crossmotion for summary judgment and response to Plaintiff's motion for summary judgment (current deadline is April 19).
- **June 7**: Deadline for Plaintiff to file a combined reply in support of its motion for summary judgment and response to Defendants' and Defendant-Intervenor's cross-motions for summary judgment (current deadline is May 17).
- **July 12**: Deadline for Defendants to file a reply in support of their crossmotion for summary judgment (current deadline is June 14).
- **July 26**: Deadline for Defendant-Intervenor to file a reply in support of its cross-motion for summary judgment (current deadline is June 14).

There is good cause to grant this stipulated motion. Defendants' counsel is in the midst of an office move that is affecting access to work files and is facing

Page 2 Stipulated Motion to Revise/Extend Summary Judgment Briefing Deadlines; Cascadia Wildlands v. Adcock, et al., Case No. 6:22-cv-00767-AA

several unanticipated deadlines in other matters; the requested summary judgment extension is modest and will address these developments and allow for preparation of adequate briefing in the instant case. Counsel for Plaintiff and Defendant-Intervenor, for their part, are facing briefing deadlines and argument dates in other matters; the requested summary judgment extension is modest will allow for preparation of adequate briefing in the instant case.

For these reasons, this Court should grant this stipulated motion.

Dated this 4th day of April, 2024.

Respectfully submitted,

NATALIE K. WIGHT United States Attorney District of Oregon

/s/ Sean E. Martin
SEAN E. MARTIN
Assistant United States Attorney
Attorneys for Defendants

/s/ Sangye Ince-Johannsen SANGYE INCE-JOHANNSEN Attorney for Plaintiff

/s/ Sara Ghafouri
SARA GHAFOURI
Attorney for Defendant-Intervenor